

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

VIA ECF

December 6, 2024

The Honorable George B. Daniels
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Daniels:

Plaintiffs with claims against defendant Al Rajhi Bank ("ARB") write with an administrative request for an order from the Court to facilitate the efficient filing of (and public access to) judicial documents to be filed in connection with ARB's renewed motion to dismiss, in advance of the December 10, 2024 oral argument.

As explained in Plaintiffs' December 2, 2024 letter (ECF No. 10564), Plaintiffs are preparing to publicly file their Corrected Averment of Jurisdictional Facts and Evidence and/or Statement of Facts Pursuant to Rule 56.1 (ECF No. 9764), and all 209 exhibits thereto, via the Court's ECF system. During our preparations for ECF filing, we have identified a number of exhibits that the ECF system is unable to accept given their file sizes (greater than the 10 MB threshold). Based on consultations with Your Honor's Chambers, as well as representatives from the SDNY's Records Management Office, Plaintiffs respectfully request the Court's approval to file a complete set of the 209 exhibits on DVDs, which will be deposited with the Records Management Office.

At the request of the Records Management Office, and to avoid an unrealistic burden of having to reproduce DVDs for members of the public, Plaintiffs respectfully agree to make available copies of all publicly filed DVDs upon request – either by means of duplicate DVDs, or in due course by posting the 209 exhibits on a dedicated ShareFile or weblink for download. Plaintiffs will provide counsel's contact information for this purpose when filing the DVDs, and during the ECF filing process.

The Court has previously authorized Plaintiffs in this MDL to file exhibits on DVDs with the Clerk of the Court via the process described herein, including most recently at ECF No. 9923 (June 17, 2024 Order).

Plaintiffs thank the Court for its attention to this matter.

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Respectfully submitted,

COZEN O'CONNOR

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*On Behalf of Plaintiffs With Claims
Against Defendant Al Rajhi Bank*